

Judge: Hon. Christopher M. Alston
Chapter: 7

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

STANLEY J. CAREY,
MARY K. CAREY,

Debtors.

Case No. 22-11595-CMA

EX PARTE APPLICATION FOR 2004 ORDER
AUTHORIZING THE TRUSTEE TO COMPEL
PRODUCTION OF DOCUMENTS AND
DECLARATION IN SUPPORT THEREOF

Edmund J. Wood, the Chapter 7 Trustee of the above-referenced bankruptcy estate ("Trustee") moves this court for an *ex parte* order compelling production of documents by Wells Fargo Clearing Services, LLC, of all documents in its possession or control relating to financial accounts it maintained with the Debtors and or entities in which they have or had an interest.

Dated this 18th day of September, 2023.

Wood & Jones, P.S.

/s/ Denice E. Moewes

Denice E. Moewes, WSBA #19464
Attorney for Edmund J. Wood
Chapter 7 Trustee

DECLARATION OF DENICE E. MOEWES

I, DENICE E. MOEWES, declare and state as follows:

1. I am the Attorney for the Trustee in this case. I make this declaration from my personal knowledge, and I am competent to testify.

2004 MOTION

2. The Trustee is investigating the financial transactions, assets and liabilities of the Debtors. Either the Debtors or entities in which they have or had an interest maintained financial accounts with Wells Fargo Advisors, Wells Fargo Clearing Services, LLC. The Trustee is seeking a 2004 order which authorizes the Trustee to compel the production of those records by the date set forth in a subpoena to be issued by me.

I certify under penalty of perjury under the laws of the State of Washington
that the foregoing is true and correct to the best of my knowledge.

Signed and dated this 18th day of September, 2023 at Seattle, Washington.

/s/Denice E. Moewes
Denice E. Moewes, WSBA #19464